

1
AFFIDAVIT

I, Caitlin Moynihan, having been duly sworn, do depose and say as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI). HSI is a directorate within Immigration and Customs Enforcement (ICE). ICE is a subordinate component of the Department of Homeland Security (DHS) and the successor to many of the law enforcement powers of the former Immigration and Naturalization Service and the former U.S. Customs Service. I have been a Special Agent since October 2009. I graduated from the Federal Law Enforcement Training Center in April 2010. I am currently assigned to the Burlington, Vermont Residence Office. I hold a Bachelor of Arts degree in sociology from Providence College. Throughout my time with HSI, I have gained experience, through training and everyday work, in investigating violations relating to child exploitation and child pornography.

2. This Affidavit is offered to demonstrate that probable cause exists to believe that on or about May 15, 2019, Louis HAMLIN, of 5726 Main Road, Huntington, Vermont, knowingly possessed at least one matter which contains any visual depiction that had been produced using materials which had been shipped and transported by any means and facility of interstate and foreign commerce, including by computer, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, in violation of 18 U.S.C. § 2252(a)(4)(B).

3. I have not set forth all facts I know from my investigation into this matter. Rather, I have included those facts I believe establish probable cause to believe that Louis HAMLIN committed the foregoing offense. My knowledge comes from my own investigation in this matter, my conversations with other law enforcement personnel, and my review of reports and the evidence in this matter.

PROBABLE CAUSE

4. At approximately 6:08 a.m., on May 15, 2019, other law enforcement personnel and I executed a search warrant at 5726 Main Road in Huntington, Vermont (the Subject Premises). During the execution of the search warrant, we encountered one individual, later identified to be Louis HAMLIN. I asked HAMLIN to step outside while agents and officers entered the Subject Premises to perform a security sweep. I explained to HAMLIN that there was a federal search warrant for the Subject Premises and that I would explain further once a security sweep was completed. As the security sweep was occurring, I asked HAMLIN to step back inside the Subject Premises. At this time, I again informed HAMLIN that there was a federal search warrant for the Subject Premises. I also advised him that he was not under arrest, he was free to leave, he had no obligation to speak to us, and if he did choose to speak to us, he could end the conversation at any time. After the security sweep was completed, I asked HAMLIN if he would be willing to speak with Detective Raymond and me. Due to limited space and the number of agents and officers present in the Subject Premises conducting the search, I asked HAMLIN if he would be willing to speak to us outside, in an unmarked police vehicle. HAMLIN agreed to speak with us. Once HAMLIN entered the vehicle, Detective Raymond and I reminded him that he was not under arrest, he was not in custody, he was free to leave, he did not have to talk to us, and if he did, he could end the conversation any time. HAMLIN responded by saying, "yeah, I know my rights." At this time, HAMLIN told us the following:

a. HAMLIN lives at the Subject Premises alone. HAMLIN has multiple computers in the Subject Premises.

3

b. The youngest nude child HAMLIN has seen depicted in an image is 13 or 14 years old.

c. When asked if he ever saved any of these images on his computer, he said, “unfortunately, I have a few, yeah.”

d. After we explained to him that we wanted to make sure he was not producing child pornography, HAMLIN said the following:

- “No. I’ve already been arrested for that kind of shit.”
- “I had an affair with my daughter, when she was underage.”
- When asked if he took pictures of the abuse of his daughter, HAMLIN replied, “Uh yeah, it’s in my record.”

e. HAMLIN was asked if any images of nude kids would be found on his computer, to which he responded, “I don’t know, probably.”

f. HAMLIN said that looking at images of nude children online does not thrill him; “it’s just a little interesting.”

5. During the search of the Subject Premises, two images of child pornography were located. These images were on photo paper. The back of the photo paper of each image said, “HP everyday”. The images are described below:

a. One depicts a young nude boy, approximately 8-10 years old. The boy is wearing a necklace. The image is framed such that the boy’s penis is at the center of the photo. There appears to be another nude male behind the boy, however, only part of that individual is visible. There is no pubic hair on the young boy.

4

b. This image depicts a nude, pubescent female child with red hair, approximately 12-14 years old. The nude pubescent female child is laying with her legs spread apart, exposing her genitals. She has slight breast development and some pubic hair.

6. Detective Raymond and I spoke to HAMLIN again. At this time, we told him that we had found printed pictures that we wanted to ask him about. Detective Raymond then showed him the images of child pornography described above (*see* paragraph 5) that were found in his residence. HAMLIN stated the following regarding each image:

a. As to the image of the boy described above (§ 5(a)), HAMLIN found the image on a nudist colony website. HAMLIN indicated that the image was part of a bigger scene with other people, but he cropped it so that it was just the nude boy. HAMLIN printed the picture using the printer located inside of his residence. HAMLIN usually uses the HP photo paper. HAMLIN was interested in the boy's muscle structure, and estimated the boy to be approximately 15-16 years old.

b. As to the image of the female child with red hair described above (§ 5(b)), HAMLIN printed that image using the printer located inside of his residence. HAMLIN estimated this girl to be approximately 18-20 years old. HAMLIN indicated that there was more to the picture around the female child, but he cropped it to just include the female child.

7. Detective Raymond then asked HAMLIN about some notes that were located in his residence listing various websites. Some of the websites written on the notes included, "ThaiTeenDeepTrout" and "fatherdaughtersex.net". HAMLIN said that he "wanted to find out why I did what I did." HAMLIN said that he had been to some of these websites; however, he did not go to all of them.

5


8. Detective Raymond indicated to HAMLIN that he seems to have a real affinity for the young people. HAMLIN responded: "Well they have nicer bodies than most of the old ones, but...it's not like I'm going out and hurting anybody." HAMLIN went on to say: "I've had plenty of opportunities to do so but I don't." HAMLIN indicated he has been alone with a lot of teenage women. He said that he has counseled some of them and indicated that some of them were runaway daughters of his friends. He said that he counseled them at their residences, not his.

9. During execution of the search warrant at the Subject Premises, law enforcement found a 25-count pack of HP Everyday Photo Paper. The back of the pack indicated that the paper was made in Germany.

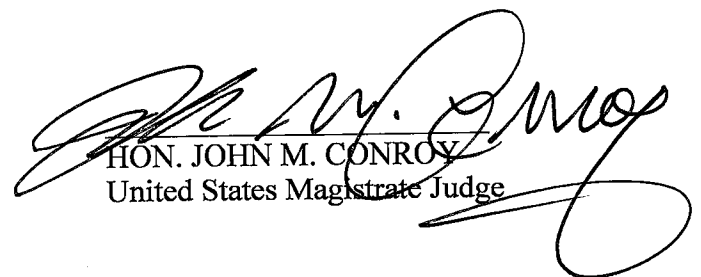
10. Based on the foregoing, I believe there is probable cause to believe that Louis HAMLIN knowingly possessed at least one matter containing any visual depiction that was produced using materials which have been shipped or transported by any means and facility of

6

interstate and foreign commerce, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct in violation of 18 U.S.C. § 2252(a)(4)(B).


CAITLIN MOYNIHAN
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me this 15th day of May, 2019.


HON. JOHN M. CONROY
United States Magistrate Judge